

WT Docket No. 01-289, FCC 13-2.

03/29/2013

My feelings mirror those of the AOPA which I have pasted in below. Please let the FAA make safety decisions with regards to flying. Please do not add more of a financial burden onto pilots.

Thank you.

Ed

“AOPA strongly opposes the proposal, which in effect would force pilots to switch to 406 MHz ELTs, thereby hindering, rather than improving, aviation safety.

Pilots and aircraft owners should explain in their comments how they use their aircraft, why they prefer to use the 121.5 MHz ELT, and any other kinds of emergency locator devices, and how the cost of switching to a 406 MHz ELT would affect their flying.

The FAA has estimated that replacing 121.5MHz ELTs with 406MHz ELTs would cost \$1,000 to \$2,000, which adds up to increased costs across the industry of \$300 million to \$500 million. The out-of-pocket expense would drain limited resources from maintenance, or prevent an aircraft owner from investing in equipment that would have a direct benefit for safety.

The mandate might leave pilots unable or unwilling to purchase other devices such as emergency position indicating radio beacons (EPIRBs), of which an estimated 9,600 are now being carried by pilots. Others use personal locator beacons, cell phones with GPS tracking, and commercial tracking devices that provide the same or better tracking than 406 MHz ELTs. AOPA believes that aircraft owner and pilots should be allowed to decide what technology works best in the particular cases of their flight operations.

AOPA believes that a mandate to install 406 MHz ELTs would quickly become outdated, while freezing GA's use of technology at 2013 levels.

AOPA opposes any mandate that relies on only one technology, and has pointed out that the plan would soon be rendered moot by the FAA's mandate to equip aircraft with ADS-B Out by the year

2020. That technology will provide the aircraft's last known position and registration number to air traffic control.

AOPA believes that the FAA should remain the sole authority for regulations affecting aviation, and that the FCC should defer on issues of aviation safety rather than impose an unnecessary regulatory burden.

Meanwhile, although satellites discontinued monitoring 121.5 MHz in February 2009, pilots and air traffic controllers continue to guard the frequency, reaffirming that the 121.5 MHz ELT remains a viable and affordable option for pilots.”